UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

	X	
	:	
In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
•	:	,
THE COMMONWEALTH OF PUERTO RICO et al.,	:	(Jointly Administered)
	:	,
Debtors. ¹	:	
	v	

INFORMATIVE MOTION OF DRIVETRAIN LLC REGARDING HEARING PROCEDURES FOR SEPTEMBER 21-22, 2022 OMNIBUS HEARING

Drivetrain, LLC in its capacity as the trustee (the "Trustee") of the Commonwealth Avoidance Actions Trust (the "Avoidance Actions Trust") respectfully submits this informative motion in response to the Court's *Order Regarding Procedures for September 21-22, 2022 Omnibus Hearing* [ECF No. 22038] (the "Scheduling Order") and respectfully states as follows:

1. John Arrastia of Continental PLLC will appear on behalf of the Trustee at the Hearing (as defined in the Scheduling Order) and reserves the right to address, as necessary, the following matters:

The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

- (a) Joinder of the Avoidance Actions Trustee to Official Committee of Unsecured Creditors' Limited Response in Support of UBS Financial Services Incorporated of Puerto Rico's Motion to Enforce the Plan of Adjustment [DE 22187 filed in Case No. 17-BK-3283-LTS];
- (b) Defendant's Motion to Set Aside Default Judgment Pursuant to Fed. R. Civ. P. 60(B)(1), (3) and (6) and for Leave to File Tendered Answer to Adversary Complaint [DE 47 in Adv. Proc. No. 19-00187] (if the Court deems necessary);
- (c) Response to Motion to Set Aside Default Judgment Pursuant to Fed. R. Civ. P. 60(B)(1), (3) and (6) and for Leave to File Tendered Answer to Adversary Complaint [DE 50 in Adv. Proc. No. 19-00187];
- (d) Reply to Response to Motion to Set Aside Default Judgment Pursuant to Fed. R. Civ. P. 60(B)(1), (3) and (6) and for Leave to File Tendered Answer to Adversary Complaint [DE 51 in Adv. Proc. No. 19-00187];
- (d) Any objections, responses, statements, joinders, or replies to any of the foregoing pleadings; and
- (e) Any statements made by any party in connection with the Title III cases or any adversary proceeding pending therein.

Respectfully submitted this 14th day of September, 2022.

By: /s/ John Arrastia

John Arrastia, Esq. (*Pro Hac Vice*) Jesus M. Suarez, Esq. (*Pro Hac Vice*) Angelo M. Castaldi, Esq. (*Pro Hac Vice*) CONTINENTAL PLLC

255 Alhambra Cir, Suite 640,

Miami, FL 33134 Tel: (305) 677-2707

jarrastia@continentalpllc.com jsuarez@continentalpllc.com acastaldi@continentalpllc.com

Counsel to the Trustee

/s/ Juan J. Casillas Ayala
Juan J. Casillas Ayala, Esq., (USDC-PR 218312)
Luis F. Llach Zúñiga, Esq. (USDC-PR 223112)
Edna M. Tejeda Oyola, Esq. (USDC-PR 219803)
Juan C. Nieves González, Esq., (USDC-PR 231707
CASILLAS, SANTIAGO & TORRES LLC
El Caribe Office Building
53 Palmeras Street, Ste. 1601
San Juan, PR 00901-2419
Tel.: (787) 523-3434
jcasillas@cstlawpr.com
lllach@cstlawpr.com
etejeda@cstlawpr.com
jnieves@cstlawpr.com

Counsel to the Trustee

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on September 14th, 2022 I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all appearing parties in the captioned proceeding.

/s/ John Arrastia
John Arrastia, Esq.

EXHIBIT APARTY APPEARANCE SHEET

Name of Party	Drivetrain, LLC, as the trustee of the	
Party Nama Abbraviation	Commonwealth Avoidance Actions Trust	
Party Name Abbreviation Omnibus Hearing Participant Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party): Name, Email, Law Firm, Phone Number Docket Entry No. for the Attorney's Notice of Appearance Zoom Screenname (See Omnibus Hearing Procedures Order, ¶ 8(a))	 Avoidance Actions Trustee First Participant John Arrastia Jarrastia@ContinentalPLLC.com Continental PLLC T: (305) 677-2728 Docket No. 20754 Zoom Screenname: Avoidance Actions Trustee / Arrastia, John / Continental PLLC Second Participant Juan J. Casillas Ayala jcasillas@cstlawpr.com Casillas, Santiago & Torres, LLC (787) 523-3439 Docket No. 701 Zoom Screenname: Avoidance Actions Trustee / Casillas, Juan / Casillas, Santiago & Torres, LLC 	
If a Party files a supplemental Party Appearance Sheet, the Party must include the Docket Entry No. of the original appearance sheet in the new filing which must be clearly marked as a "Supplemental" Party Appearance Sheet. Note: Pursuant to the September Omnibus Hearing Procedures Order ¶ 1, the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be limited to 4 attorneys appearing in the Zoom session at any given time, and each other party-in-interest shall be limited to 2 attorneys at any given time.	N/A	